

DECLARATION OF DEPUTY JAMES STRATTON

I, JAMES STRATTON, do hereby declare:

Background and Experience

1. I am a Deputy United States Marshal and have been so employed since October 2002. I am currently assigned to the United States Attorney's Office as the Asset Forfeiture Financial Investigator in the District of Oregon, Portland Office. My duties include supporting Department of Justice led criminal investigations with the identification and seizure of assets associated with criminal activity and the initiation of civil or criminal forfeiture action against these assets. In the course of my employment as a Deputy United States Marshal, I have received training in conducting financial, money laundering, and Bank Secrecy Act investigations.

Purpose of the Declaration

2. This declaration is submitted in support of a Complaint in rem for forfeiture of \$59,800.00 in U.S. Currency seized during the execution of a federal search warrant on Wells Fargo safe deposit box 8503668, hereinafter BOX 3668, held in the name of So Chan, and \$60,100.00 in U.S. Currency seized during the execution of a federal search warrant on Wells Fargo safe deposit box 8503815, hereinafter BOX 3815, held in the name of Jaio Wu, Zhen Chen, and So Chan.

3. In this declaration, I will demonstrate there is probable cause that the U.S. Currency described above constitutes property furnished or intended to be furnished by any person in exchange for a controlled substance, or proceeds traceable to such an exchange, in violation of

21 U.S.C. § 841(a)(1) and § 846 and is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

4. The facts set forth in this declaration are based on the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; my review of records related to this investigation including interviews of witnesses; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this declaration is submitted for the limited purpose of establishing probable cause for the Complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

Summary of the Investigation

5. Beginning in April 2020, the Oregon State Police (OSP) began receiving complaints about marijuana grows in Columbia County, Oregon. OSP initiated an investigation in July 2020. This investigation grew in scope leading to a partnering with the Drug Enforcement Administration (DEA), the United States Attorney's Office (USAO), the United States Marshal Service (USMS), and other investigative agencies.

6. The investigation identified a Drug Trafficking Organization (DTO) led by Fayao (Paul) Rong, (hereinafter "Rong"), who resides in Houston, Texas. The investigation revealed that Rong purchased numerous residential houses in Oregon and converted them with hired help into illegal indoor marijuana grows. His DTO grows, harvests, and ultimately transports marijuana to distribute in states where it is not legal, known as "black market marijuana."

7. Investigators estimate that between August 30, 2020, and August 30, 2021, the Rong DTO grew or trafficked black-market marijuana with an approximate street value of over \$13 million dollars.

8. As part of the conspiracy, Rong and others were operating approximately seventeen properties as active marijuana grows, and two properties were in the process of being developed into marijuana grows as of September 2021.

9. To disguise his ownership in many of the properties, Rong used other individuals and corporate entities as straw buyers to purchase the homes, pay for upgrades in utilities, and to pay utility bills. While he used straws, Rong continued to be in control of most of the houses and paid the utility bills, often in cash.

10. Investigators identified a man named Rui Liang as a manager of the Rong DTO. He was responsible for supplying equipment to the Rong DTO properties, paying workers in cash for assisting in the grows, and transporting Rong DTO marijuana from the grow locations to other locations used to transfer and transport the marijuana. Based on cell phone records described below, investigators believe that Rui Liang started working for the Rong DTO by at least October 2020.

11. After developing probable cause that the Rong DTO properties were being used to facilitate the illegal production of marijuana, law enforcement applied for and obtained federal search warrants for each of the properties, and the residences of several co-conspirators, to include the residence of Rui Liang. U.S. Magistrate Judge Beckerman authorized the warrants. On September 8 and 9, 2021, law enforcement executed the warrants. Collectively, investigators found and destroyed 32,999 live marijuana plants, 1,504 pounds of processed marijuana, and also seized 23 firearms and \$353,000 in U.S. currency.

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12. Law enforcement also obtained a warrant to search property owned by Rong in Houston, Texas. This warrant was also served on September 8, 2021. Law enforcement officials interviewed Rong, with his consent. During the interview, Rong stated that he met with a loosely organized group of Chinese individuals at a restaurant in Portland, Oregon, known as the Hong Kong Café (“the restaurant”). Rong described a type of informal cooperative where they periodically met and exchanged information on how best to establish and operate indoor marijuana grows in Oregon. Rong said the individuals he met with at the restaurant worked together to grow and sell illegal marijuana. For example, Rong stated that if one of them needed an electrician, a contractor or a grower, others would provide names to consider using. Rong said that until April 2021, he was able to sell his marijuana at these same meetings. Significant to this declaration, Rong identified a photograph of Rui Liang and told investigators that Rui Liang worked for him doing remodeling at the marijuana grow sites in Oregon.

Information About the RONG DTO

13. During the investigation, law enforcement obtained toll records for Rong’s cell phone. An analysis of these records showed that between October 3, 2020, and February 6, 2021, Rui Liang was Rong’s most frequent contact, with 333 contacts.

14. Rui Liang was also in frequent communication with other lieutenants in the Rong DTO. Phone tolls showed that between November 20, 2020 and February 17, 2021, Rui Liang and Lichang Chen contacted each other 448 times. Investigators believe Lichang Chen was in charge of coordinating shipments of Rong DTO marijuana out of Oregon.

15. On March 11, 2021, a federal search warrant was obtained, authorizing the tracking of a white Ford van bearing Oregon plate 395 MAT (hereinafter “395 MAT”). This vehicle is

registered to Lichang Chen but was identified by investigators as having been primarily driven by Rui Liang. 395 MAT was monitored until August 31, 2021.

16. Throughout the monitoring period, the following observations of note were made:

a. 395 MAT spent most of the time in Columbia County, at Rong DTO marijuana grows located on Rulyville Road, Taylorville Road, and Palm Creek Road.

b. Approximately once or twice a week 395 MAT returned to Portland and parked overnight at Rui Liang's house located at 4008 SE 79th Avenue. (As explained below, a search warrant later served at Rui Liang's residence resulted in the seizure and uncontested administrative forfeiture of \$174,990 in cash used to fund the Rong DTO, as well as keys to two safe deposit boxes whose contents are the subject of the current complaint).

c. While in Portland, 395 MAT travelled to several hydroponic grow stores in Portland.

d. Approximately once a month, 395 MAT travelled to 24023 NE Shea Lane, Unit 110, in Wood Village. This location was used by the Rong DTO to transfer and distribute black market marijuana.

e. 395 MAT was monitored in person by investigators on several occasions. On each of those occasions, Rui Liang was the only person ever seen driving it.

17. Investigators analyzed data from the tracker on 395 MAT and noticed once or twice a week it would frequent a business park located at NE Shea Lane, Wood Village Oregon. Investigators conducted a canvass of the area and spoke with several business owners. One of those owners, referred to herein as Business Owner #1, identified Unit 110 as having a lot of activity involving white Ford Transit vans. Along with other facts, investigators identified this as the Rong

DTO “Distribution Center.” Between April 16, 2021, and August 19, 2021, Business Owner #1 reported information to law enforcement including the following:

- On April 16, 2021, 395 MAT met with two other white Ford Transit vans known to be part of the Rong DTO and individuals in these vehicles transferred items between each van and then departed.
- On April 22, 2021, bags were seen being loaded into 395 MAT.
- On April 28, 2021, 395 MAT arrived and joined another Rong DTO Ford Transit van. Boxes were moved from the other van into 395 MAT.
- On May 4, 2021, Investigators observed Rui Liang supervise a group of approximately five Hispanic males unloading a 40’ shipping container containing ‘Gro-blocks,’ a common item used in the manufacturing of marijuana.
- On May 14, 2021, investigators observed 395 MAT meeting with another White Transit Van and a Nissan with a temporary tag at the Distribution Center. Individuals associated with these vehicles then loaded boxes onto a tractor trailer. Investigators followed the trailer to a crossdocking company named Northwest Freight.
- On June 25, 2021, Business Owner #1 reported that 395 MAT and two other white Ford Transit vans known to be part of the Rong DTO were observed arriving at the Distribution Center. Individuals in the vehicles offloaded boxes from the Transit vans onto a tractor trailer. Investigators obtained a photograph of the individuals taken as they offloaded the boxes. Rui Liang was one of the men in the photograph.
- On August 19, 2021, 395 MAT and another Rong DTO white Ford Transit van arrived, and occupants loaded boxes into a gray panel van. Investigators responded and believe that the loaded boxes contained Rong DTO marijuana.

- Tracking Logs from 395 MAT showed it often travelled to 22667 NE Townsend Way, Fairview, Oregon, after leaving the Distribution Center. This location is approximately a five-minute drive from the Distribution Center.
- On April 22, 2021, investigators reviewed video obtained from the Distribution Center and observed that on March 26, 2021, at approximately 9:14 a.m., a semi-truck and trailer arrived. Investigators identified the semi-truck and trailer as belonging to a trucking company believed to be transporting marijuana for the Rong DTO. At approximately 9:32 a.m., 395 MAT arrived and joined the semi-truck. They parked back-to-back and investigators observed the rear door of 395 MAT and the doors on the trailer both open. Investigators believe these vehicles were involved in transferring Rong DTO marijuana from 395 MAT to the trailer.

18. On April 28, 2021, Investigators observed Rui Liang arrive at 22667 NE Townsend Way, driving 395 MAT. Rui Liang was seen helping transfer boxes believed to contain Rong DTO marijuana from 395 MAT to a tractor trailer. The next day, April 29, 2021, the tractor trailer was covertly followed out of Oregon and into Idaho. It was subsequently stopped by law enforcement in Idaho on April 29th for several traffic violations. In a subsequent search, officers found and seized 298 pounds of processed marijuana from inside the trailer. The trailer also contained a load of pears that were to be transported to New York according to shipping documents.

19. The same day, Rong's primary cell phone showed 37 calls between Rong and Rui Liang, 4 calls between Rong and Lichang Chen, and 19 calls between Rong and the conspirators operating the shipping business.

The Search of Rui Liang's Residence

20. On September 8, 2021, a federal search warrant was served at Rui Liang's home in Portland, Oregon, which he shared with his wife So Chan, and daughter Kristine Liang. Rui Liang was voluntarily interviewed about his involvement in the Rong DTO and marijuana production. Rui Liang initially denied but later admitted he was involved in marijuana production. He said that he worked for someone else, who just instructed him where to go. Rui Liang eventually admitted that he worked for Fayao Rong. Rui Liang told investigators that Rong paid him \$200 a day and he worked 3-4 days a week for Rong for about the last 5 months. Rui Liang told investigators that Rong called him with instructions on where to go and who to meet. Rui Liang said his primary job at the marijuana grows was doing construction. Rui said Rong does not pay him directly. When asked who paid him, he pointed to a photograph of Li Chang Chen. Li Chang Chen has been identified as a high level DTO member associated with Rong. Investigators informed Rui Liang that they had seen him deliver boxes of marijuana, loaded onto semi-trucks, and intercepted leaving the state. Rui Liang said he was instructed to bring the boxes there and claimed not to know what was in them.

21. Rui Liang admitted he paid people at the marijuana grows, but only when directed to by Rong. He told investigators the money he uses to pay people at the marijuana grow locations was given to him by Rong and stored in a safe in Rui Liang's house. Rui Liang then showed investigators where the safe was located on the first floor in an office/bedroom in his home. He provided the code to open it, and inside was a total of \$174,990 in cash and money orders. Law enforcement seized this money as drug proceeds and initiated an administrative forfeiture action. Rui Liang was served with notice but never filed a claim to these seized funds. Since no one filed a claim, and the time for filing elapsed, these funds have been administratively forfeited.

22. Also observed in the room identified as belonging to Rui Liang and So Chan were several ledgers. While they were written in Asian characters it was apparent based on my experience that the ledgers were tracking funds based on the numbers mixed in with the Asian characters in a list or ledger type format. Along with the ledgers, and elsewhere in the house, were large stacks of receipts. The receipts reflected grocery purchases, vehicle maintenance, and purchases from home improvement stores, and nurseries. The number and value of the receipts far exceeded what a single family could reasonably be expected to spend, and I believe they are related to the illegal marijuana enterprise.

23. During the same search, Investigators found a second safe located in a bedroom, which residents identified as belonging to Rui Liang and his wife So Chan. Inside the safe was a large sum of cash. Rui Liang opened the safe. The amount was later determined to be \$41,286.00 in U.S. currency. In that same safe, agents also found jewelry, three safe deposit box keys, and some passports belonging to members of the household, including Rui Liang. An examination of the safe deposit box keys showed that two of the keys were marked with the number 3668, and the third was marked with 3815. These numbers correspond with the last 4 numbers of the two safe deposit boxes that are the subject of this declaration. When asked about the cash in the bedroom safe, Rui Liang said there was approximately \$20,000 that came from the sale of a car. Investigators asked Rui Liang about the keys, and he said they belonged to his wife. Investigators then contacted So Chan via cell phone and spoke to her with her daughter acting as translator. So Chan said the keys were for a safe deposit box that contained approximately \$50,000 to \$60,000 in U.S. currency, which she had received as a gift from a family member before coming to the United States, and more personal jewelry. She refused to give investigators consent to search the box. This safe deposit box is one of the two boxes that are the subject of this declaration.

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24. At the time of the search warrant, a cell phone belonging to Rui Liang was seized. A digital image was taken of the phone and examined by law enforcement. The content of the phone showed that it had only recently been acquired. On the phone evidence was discovered showing that Rui Liang was involved in the Rong DTO at a managerial level, including:

- Web history showing Rui Liang had visited the account payment website for Pacific Power. Rui Liang's home address is not serviced by Pacific Power, but multiple Rong DTO marijuana grow locations, with significant electricity consumption, are serviced by Pacific Power.
- 4 videos showing active indoor marijuana grows.
- 51 pictures of bulk marijuana and indoor marijuana plants.
- The screenshot of a power bill due July 26, 2021, for \$10,063. The provider is Pacific Power, to the address of 6525 Rickreall Rd., Independence, Oregon. This location was a Rong DTO Marijuana Grow. On September 9, 2021, Investigators seized and destroyed 1,811 suspected marijuana plants from that location.
- 60 photos of receipts dated between July 2021 and August 2021. These receipts showed cash purchases of gasoline, grow supplies from Powell Garden Center and Four-Season Gardening, and building supplies from Home Depot. The approximate total of these receipts was \$20,000.
- WeChat conversations between Rui Liang and a contact named "Paul," whom I believe to be Fayao "Paul" Rong. The chat contains photos of power bills at Rong DTO marijuana grows; receipts for items paid in cash at Powell Garden Supply; receipts for Western Union Money orders; financial ledgers; bulk marijuana; and infrastructure consistent with an indoor marijuana grow.

- WeChat conversations between Rui Liang and a contact whose name is two Asian characters which Google Translate service translated to “Fat Kee.” Rui Liang and Fat Kee exchange numerous photos of money orders (addressed to Fayao Rong and Sujuan Liang, who is Rong’s wife), Home Depot receipts that list the type of payment as cash, bulk marijuana, the address of Rong DTO marijuana grows and financial ledgers.
- WeChat conversations between Rui Liang and a contact named Zhong Zhen. The conversation shows several photos sent by Rui Liang of infrastructure taken from inside an indoor marijuana grow.
- A WeChat conversation between Rui Liang and a contact named Ding (Fayao Rong has a brother named Ding Rong, who is a co-conspirator in the Rong DTO). The conversation shows several photos sent by Rui Liang of plants growing in an indoor marijuana grow.
- Text message conversations between Rui Liang and numbers known to belong to Fayao Rong. These conversations contained addresses, including the address of the Distribution Center.

25. On September 8 and 9, 2021, search warrants and interviews were conducted at other Rong DTO member residences and marijuana grows. During those interviews, members of the conspiracy identified Rui Liang and spoke of their knowledge of his role in the Rong DTO. The results of those interviews are annotated below:

- Ken Chen, a member of the DTO who also did construction work at some of the grow sites, said that Rui Liang also worked for Rong. Ken Chen met him at the marijuana grows a few months ago.

- Jaejin Chen, a Rong DTO manager, told investigators that he knew Rui Liang worked for Rong.
- Hui Yuan Chen, an admitted marijuana grower in the Rong DTO, told investigators he had delivered marijuana to Rui Liang for distribution on two occasions.

The Administrative Claim for the \$41,286 U.S. Currency

26. As previously outlined, law enforcement seized the \$41,286 U.S. currency found in the bedroom safe of Rui Liang and So Chan and initiated administrative forfeiture proceedings. Rui Liang did not file a claim in that proceeding, but So Chan did file a claim. In it, she stated that the seized money came from a combination of wages, gambling winnings, tax refunds, and stimulus payments. As evidence, she provided bank statements going back to 2013, IRS form W2-G's, and letters stating the amount of her expected refund from tax return preparers going back to her 2014 refund.

27. I reviewed these records and although they reflect that either Rui Liang or So Chan received payments from different sources, those records do not reflect that either of them withdrew cash from their joint bank account in an amount which could reasonably be claimed as the contents of the safe. Rather, the records show that funds from other sources were deposited into their joint checking account but were drawn down in the ordinary course through the payment of expenses. I found no cash withdrawals over \$2,000, which might support an inference that the seized cash was from non-drug sources.

28. So Chan also submitted forms as part of her claim demonstrating gambling winnings by Rui Liang totaling almost \$13,000, which is far less than the \$41,286 found in the safe. In an interview mentioned later in this declaration So Chan stated that she stores cash in her safe deposit box to prevent Rui Liang from having access to it because he likes to gamble. The

gambling winning records are dated, with one third of the winnings occurring in 2015, and the most recent winnings occurring in 2018. My review of relevant bank records shows that when these gambling funds were acquired, the household was living paycheck to paycheck, making it unlikely that any of the cash found in the safe represented older gambling winnings. In 2018, records show the household spent almost \$2,000 more than they appear to have earned. Rui Liang told investigators that there was only about \$20,000 in the safe and that it was from the sale of a car. He did not mention gambling winnings, tax refunds, or general savings as a source of the funds in the safe, nor has he provided evidence that a car was actually sold and that he received cash proceeds from it. As stated above, Rui Liang has not filed a claim for any portion of the \$41,286 found in his safe. So Chan never mentioned this alleged car sale or that the proceeds were part of the seized funds. Thus, Rui Liang and So Chan have made inconsistent statements about the source of the \$41,286, adding to my belief that they are concealing drug proceeds. Based on So Chan's claim in the administrative action, the government filed a civil forfeiture action in this District against the \$41,286. So Chan filed a claim and answer in that case, which is pending. (3:22-cv-00246-BR).

Safe Deposit Boxes

29. On April 5, 2022, DEA Agents served a search warrant on BOX 3668, held in the name of So Chan, and BOX 3815, held in the name of Zhen Chen, Jaio Wu, and So Chan. I was present and witnessed the search of the safe deposit boxes.

30. Inside BOX 3668 we found two bank bags, one green and one blue. Inside the green bag was a naturalization certificate in the name of So Han Chan, and Oregon birth certificates in the names of Samuel Liang and Kristine Liang, along with \$100 bills, wrapped in aluminum foil and separated into \$1,000 increments, with one \$100 bill wrapped around 9 others. Inside the blue

bag were jewelry items and 3 bundles of \$100 bills wrapped in aluminum foil. Two of the bundles were prepared exactly as the bundles in the other bag, with one \$100 bill wrapped around 9 others. However, the third was a stack containing \$100 and \$50 bills that were visibly older and wrapped in a rubber band. The top bill of that stack was printed in 1996.

31. Inside BOX 3815 we found three plastic bags containing envelopes of \$100 bills. Most of the bills were prepared in the same way as the currency found in BOX 3668, with one \$100 bill wrapped around 9 others. Also present in BOX 3815 were naturalization documents for Zhen Yao Chen and Jiao Yue Wu, and two Chinese documents with what appears to be a picture of Zhen Yao Chen and Jiao Yue Wu based on the photographs on the naturalization documents.

32. Wells Fargo, Bank Manager Jeff Ward, and bank employee Nicole Velazquez were present during the search. After the search they counted the seized funds on a money counting machine per Wells Fargo policy. Their resulting counts were \$59,800.00 from BOX 3668, and \$60,100.00 from BOX 3815. Jeff Ward provided DEA a receipt showing the itemized count.

33. DEA took the funds to a company called Loomis for an official seizure count per DEA policy. Loomis counted the funds using a money counting machine and provided an official count of \$59,800.00 for the funds seized from BOX 3668, and \$60,100.00 for the funds seized from BOX 3815. DEA commenced administrative forfeiture action against the funds from both of the safe deposit boxes.

34. On February 21, 2022, I conducted a telephonic interview of So Chan, with her daughter Kristine Liang acting as an interpreter. During the interview Kristine and So Chan told me that So Chan has worked as a seamstress for the last 10 years. Her pay varied but last year she made approximately \$36,000. My review of So Chan's bank statements showed she earned approximately \$27,000 in 2019, and \$32,000 in 2020. Records indicate that she deposited this

income into a bank account and did not withdraw large amounts of cash which may have been placed in the safe deposit boxes. So Chan told me she had no other sources of income. Kristine told me she did not contribute to the household and lived at home.

35. So Chan told me that Rui Liang has not worked since 2017 or 2018. She said that prior to that, he had worked part time at a restaurant for 10 years, making about \$1,100 per month. I know this information is false because, as stated above, Rui Liang was working for the Rong DTO from at least October 2020 - receiving remuneration for his work - and he admitted that the \$174,990 found in his other safe in September 2021 were funds used by the Rong DTO.

36. I asked So Chan about the safe deposit boxes relevant to this declaration, and So Chan told me they contained some “stuff” she brought with her from China, but she did not specify that there was cash in the safe deposit box. So Chan said the safe deposit box was only in her name, and she had never allowed Rui Liang to access it. However, the keys to both safe deposit boxes were in a shared bedroom safe that Rui Liang opened for investigators.

37. According to bank records, the primary signer for access to the second safe deposit box is Zhen Yao Chen. According to Kristine, this is her deceased grandfather. Kristine believed the second safe deposit box belonged to her grandmother Jiao Wu.

38. On March 2, 2022, I conducted a follow up interview with Kristine Liang and So Chan. I directly asked her about cash inside BOX 3668. So Chan acknowledged there was cash in BOX 3668 and told me she smuggled the funds into the United States in April 1994 in the form of undeclared U.S. Currency. So Chan told me that she keeps the money in the safe deposit box and does not allow Rui Liang to have access to the box because he likes to gamble.

The Administrative Claims for \$59,800 and \$60,100 in U.S. currency

39. On June 19, 2022, So Chan filed an online claim in DEA's administrative forfeiture action for the \$59,800 found in BOX 3668. In her claim So Chan asserts that BOX 3668 actually contained \$65,000.00. She claims there was \$50,000, which she brought from China when she came to the United States as referenced in the interview above, and an additional \$15,000, earned through wages and tax returns. So Chan also asserts that since the safe deposit box is in her name and she is the only person who has access to the box, the cash inside the safe deposit box is not proceeds of criminal activity.

40. As referenced earlier in this declaration both Wells Fargo employees and Loomis confirmed that only \$59,800 was removed from BOX 3668.

41. In her claim, and during the interview referenced above, So Chan asserts that she brought \$50,000 in United States Currency from China in 1994 and placed it in the safe deposit box. However, the oldest bills found during the search of the box were produced in 1996, and the majority of the bills are much newer.

42. So Chan also claims there was an additional \$15,000, located in the safe deposit box. So Chan states that these funds came from wages and tax returns. As I referenced earlier in this declaration, my review of financial records provided in her claim for the \$41,286, and my interviews conducted with So Chan, reflect that she was the sole provider for a family of four. The records submitted by So Chan, and her statements during the interviews, reflect that \$36,000 was her highest annual salary in 10 years. For most of that time she made significantly less. Additionally, the records showed some IRS deposits into the account, but there are no corresponding large cash withdrawals. Rather the funds appear to have been spent in day-to-day fashion.

43. In my training, experience and from conversations with other law enforcement officers, I know that individuals involved in the drug trade, will often place items of value, such as currency, vehicles, houses, and jewelry, in friends, family members, and a spouse's name, or in their care. They do this in an attempt to disguise the source of the assets and to insulate them from government forfeiture.

44. On June 18, 2022, Jiao Wu (So Chan's mother) filed an online claim in DEA's administrative forfeiture action for the \$60,100 found in BOX 3815. On July 27, 2022, the United States Attorney's Office received a notarized paper copy, which was substantially the same as the online claim. In it So Chan, on behalf of her mother Jiao Wu, claims So Chan's father left some money to her mother when he died, and the \$60,100.00 found in BOX 3815 was a combination of the money left by her father when he died, and gifts provided to Jiao Wu by her children over that last 30 years. To support this claim, So Chan on behalf of her mother Jiao Wu, provided a safe deposit box entry log, and a page from a bank statement belonging to Jiao, with an account number ending in 9317, showing that BOX 3815 is paid from this account. So Chan also stated that her mother is 89 years old and plans to use this money for her funeral arrangements.

45. During the interview of So Chan conducted on March 12, 2012, Kristine told me that her grandparents moved into assisted living in 2012, and that the government was paying for that assisted living. I know that when someone files for public assistance like this they typically must sign documents stating that they do not have sufficient funds to pay for the services themselves.

46. As stated above, So Chan and Rui Liang had a key to BOX 3815 in their safe and So Chan is authorized by the bank to access BOX 3815. Based on the entry record provided by So Chan on Jiao Wu's behalf, So Chan accessed BOX 3815 three times: first, on the day it was opened

on June 4, 2010; second, on June 11, 2015; and on August 13, 2021, which was just one month before the Rong DTO search warrants.

47. In the claim she filed on Jiao Wu's behalf, So Chan stated that Jiao Wu is old and that the funds in the safe deposit box are intended to be used for Jiao Wu's burial expenses. In the administrative claim, So Chan states that she was placed as a signer for BOX 3815 for beneficiary purposes.

CONCLUSION

48. There is probable cause that the \$59,800 in U.S. currency seized from safe deposit box 8503668, held by So Chan, and the \$60,100 in U.S. currency seized from safe deposit box 8503815 held by Zhen Chen, Jiao Wu and So Chan, constitutes property furnished or intended to be furnished by any person in exchange for a controlled substance, or proceeds traceable to such an exchange, in violation of 21 U.S.C §§ 841(a)(1) and 846, and is forfeitable to the United States pursuant to 21 U.S.C § 881(a)(6).

49. I have presented this declaration to Assistant United States Attorney Christopher Cardani who advised me that, in his opinion, the proposed complaint is supported by probable cause.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. 1746.

Executed this 25th day of October 2022.

/s/ James Stratton
JAMES STRATTON
Deputy U.S. Marshal
United States Marshal Service